

290883

ACCEPTED FOR PROCESSING - 2020 March 12 11:10 AM - SCPSC - 2019-281-S - Page 1 of 8

Easterling, Deborah

From: Lisa Levine <lev99webb@icloud.com>
Sent: Wednesday, March 11, 2020 6:08 PM
To: PSC Contact; John Hoefer
Subject: [External] 2019-281-S Lisa Levine Pro Se Interrogatory
Attachments: 2019-281-S, Palmetto Utilities, Petition to Intervene by Lisa Levine - order 2020-110 response - flattened.pdf

Please find enclosed the first set of interrogatories for the above referenced docket. If you need any additional documentation please do not hesitate to contact me.

With kindest regards,
Lisa Levine



STATE OF SOUTH CAROLINA

(Caption of Case)

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

COVER SHEET

APPLICATION OF PALMETTO
UTILITIES, INC. FOR AN INCREASE
OF RATES AND CHARGES FFOR THE
PROVISION OF SEWER SERVICE AND
MODIFICATIONS TO CERTAIN TERMS
AND CONDITIONS OF THE PROVISION
OF SEWER SERVICEDOCKET
NUMBER: 2019 - 281 - S

(Please type or print)

Submitted by: Lisa Levine

SC Bar Number: Pro se

Address: 2 Runneymede Ct

Telephone:

Fax:

Blythewood, SC. 29016

Other:

Email: Lev99webb@icloud.com

NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition☐ Request for item to be placed on Commission's Agenda expeditiously☒ Other: ~~Response to order 2020-110 enclosed~~ Interrogatory

INDUSTRY (Check one)

NATURE OF ACTION (Check all that apply)

- ☐ Electric
- ☐ Electric/Gas
- ☐ Electric/Telecommunications
- ☐ Electric/Water
- ☐ Electric/Water/Telecom.
- ☐ Electric/Water/Sewer
- ☐ Gas
- ☐ Railroad
- ☒ Sewer
- ☐ Telecommunications
- ☐ Transportation
- ☐ Water
- ☐ Water/Sewer
- ☐ Administrative Matter
- ☐ Other: _____

- ☐ Affidavit
- ☐ Agreement
- ☐ Answer
- ☐ Appellate Review
- ☐ Application
- ☐ Brief
- ☐ Certificate
- ☐ Comments
- ☐ Complaint
- ☐ Consent Order
- ☐ Discovery
- ☐ Exhibit
- ☐ Expedited Consideration
- ☐ Interconnection Agreement
- ☐ Interconnection Amendment
- ☐ Late-Filed Exhibit
- ☐ Letter
- ☐ Memorandum
- ☐ Motion
- ☐ Objection
- ☐ Petition
- ☐ Petition for Reconsideration
- ☐ Petition for Rulemaking
- ☐ Petition for Rule to Show Cause
- ☒ Petition to Intervene
- ☐ Petition to Intervene Out of Time
- ☐ Prefiled Testimony
- ☐ Promotion
- ☐ Proposed Order
- ☐ Protest
- ☐ Publisher's Affidavit
- ☐ Report
- ☒ Request
- ☐ Request for Certification
- ☐ Request for Investigation
- ☐ Resale Agreement
- ☐ Resale Amendment
- ☐ Reservation Letter
- ☒ Response
- ☐ Response to Discovery
- ☐ Return to Petition
- ☐ Stipulation
- ☐ Subpoena
- ☐ Tariff
- ☐ Other: _____

Print Form

Reset Form

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION
DOCKET NO. 2019-281-S

IN RE:)	
)	
APPLICATION OF PALMETTO UTILITIES)	LISA LEVINE, PRO SE
INC. FOR AN INCREASE OF RATES AND)	FIRST SET OF
CHARGES FOR THE PROVISION OF SEWER)	INTERROGATORIES TO
SERVICE AND MODIFICATIONS TO CERT-)	PALMETTO UTILITIES
AIN TERMS AND CONDITIONS OF THE)	INC.
PROVISION OF SEWER SERVICE.)	
<hr/>)	

Pursuant to S.C. Code Ann. Refs. 103-833(C), Ms. Lisa Levine ("Levine") pro se, hereby submits the First Set of Interrogatories to Palmetto Utilities, Inc. (the "Company"). Pursuant to South Carolina Rule of Civil Procedure 26(e), each interrogatory is continuing until the time of the hearing such that the Company must promptly transmit to Levine the requested information as it becomes available. Please forward to the undersigned, via email, your first iteration of responses to the following request on or before Monday, March 23, 2020:

1-1 Please provide a copy of all questions or information requests submitted to the company by the Office of Regulatory Staff ("ORS").

- 1-2 Please provide copies of all Company responses, including all supporting documents and workpapers to the questions or information requests referenced in 1-1 above.
- 1-3 Please provide a monthly history for the year preceding the implementation of the residential flat rate of \$52.10 in 2018, of the following, preferably in tabular format;
- a. Number of sewer customers by class
 - b. Number of sewer customers by class billed according to the Columbia out of city volumetric usage rates starting at 750 gallons per month to 45,000 gpm in 750 gallon increments.
- 1-4 Please provide the Company's total annual billing revenue from residential customers and the respective number of residential customers starting from the first year the Company operated until the most current full year.
- 1-5 Please explain the reason for using the 6,000 gpm Columbia out of city volumetric sewer rate of \$71.25 for comparison in the "Neighboring Wastewater Rates" chart presented at the Allowable Ex Parte Briefing held September 17, 2019 Concerning Regulatory Treatment of Plant Acquisitions.
- 1-6 Please explain why the footnotes to the above referenced chart did not indicate that the City of Columbia rate used

- for comparison is not a fixed rate but a volumetric rate that varies according to city water use.
- 1-7 Please indicate on the above referenced chart the neighboring wastewater rates that are fixed.
- 1-8 Please provide the official wastewater rate sheets for all those listed in the above referenced chart.
- 1-9 Please describe the annual operating and financial impacts (construction, technology, repair, upgrade costs) and how these costs are amortized through residential sewer rates due to the lack of an analysis of In depth infiltration/ Inflow (I/I) at the time of purchase (see Wood Report dated 11/2012).
- 1-10 Please describe the same issues asked in 1-9 for the lack of an assessment of the collection and transmission lines stated in the report referenced in 1-9.
- 1-11 Please provide any studies the Company has used to forecast flows from future development to the wastewater treatment plant (WWTP) that justified the capital costs to construct new facilities including the Northern Pipeline prior to securing commitments from customers and/or State of SC to incur the Company's costs.

- 1-11 Please provide monthly discharge rates from the start-up of the new WWTP or percentage of total capacity until the last full month.
- 1-12 Please describe how the Company will obtain new customers to justify the expansion of the WWTP.
- 1-13 Please explain the business case to purchase PRC in March 2013 with knowledge that it did not have a treatment plant in addition to the list of deficiencies on page 8 of the ex parte presentation.
- 1-14 Please explain the impact of the decision in 1-13 on the need to raise rates, implement fixed rate billing and construct additional facilities.
- 1-15 Please provide documentation that describes the statement in the ex parte presentation that "PRC agreed to continue with the then-existing City rates and defer determination of PRC rate base until later" and explain what was defined as "later".
- 1-16 Please provide a list of the types of system tampering by customers and/or others that the Company has had to repair along with the associated costs for each repair.
- 1-17 Please explain the reason for not requesting that the tamper fee equal the amount of the repair rather than the proposed flat fee per event.

- 1-18 Please describe any residential rate relief programs for customers on fixed incomes and/or who may be unable to afford the requested rate.
- 1-19 Please describe the average daily usage of the Northern Pipeline relative to its total capacity and what percentage is available for additional flow from development and growth in the area served.
- 1-20 Please list the counties that the Company pays property taxes to and the amounts paid to each county from the year before the flat rate implementation until this year.
- 1-21 Please explain the impact of property taxes on the rate increase request that was mentioned as a reason by the Utility at a recent public hearing and broadcast on the local news.
- 1-22 Please provide the return on equity and return on operating margin percentages by year since 2011 until the last complete fiscal/calendar year.
- 1-23 Please describe the Utility's shareholder primacy position.
- 1-24 Please provide the number of truck loadout areas built during the expansion, the average number of times per day that the expanded truck loadout area for solids handling is used for filling multiple sludge containers simultaneously

and the average number of loadout areas that are occupied during multiple fillings.

- 1-25 Please describe the sources of funding, the amounts secured, the total interest and the payback timeline for the capital improvements that are the basis for the rate hike increase request.
- 1-26 Please explain how the rate hike will impact the repayment of the sources of funding requested in 1-25 duration, and interest.
- 1-27 Please provide the amount of revenue from residential customers for the complete year prior to implementation of the fixed rate and the calculated amount of revenue that would have been collected if the same customers paid the approved fixed rate.

Lisa Levine, pro se

By: s/Lisa Levine
 Lisa Levine
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 Blythewood, SC 29016
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lev99webb@icloud.com

March 11, 2020

Blythewood, SC